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FILED  
U.S. DISTRICT COURT  
2020 JAN 22 A 11:04  
DISTRICT OF UTAH  
SEAL  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PATRICK JOHN VENTERS,  
aka "LION",

Defendant.

**INDICTMENT**

VIOLATIONS:

Counts I, III, and V: 21 U.S.C. §  
841(a)(1), Distribution of Cocaine,

Counts II, IV, and VI: 18 U.S.C. §  
924(c)(1)(A), Carrying a Firearm During  
and in Relation to a Drug Trafficking  
Crime.

Case: 2:20-cr-00026  
Assigned To : Barlow, David B.  
Assign. Date : 1/22/2020  
Description:

The Grand Jury Charges:

**COUNT I**

21 U.S.C. § 841(a)(1)  
(Distribution of Cocaine)

On or about October 10, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly and intentionally distribute cocaine, a schedule II

controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C.

§ 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

**COUNT II**

18 U.S.C. § 924(c)(1)(A)

(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)

On or about October 10, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly carry a firearm during and in relation to a drug trafficking crime, to wit: Distribution of Cocaine, in violation of 21 U.S.C. § 841(a)(1) as alleged in Count I of this Indictment, which Count is incorporated by reference herein; all in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT III**

21 U.S.C. § 841(a)(1)

(Distribution of Cocaine)

On or about October 18, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly and intentionally distribute cocaine, a schedule II controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

**COUNT IV**

18 U.S.C. § 924(c)(1)(A)

(Carrying Firearms During and in Relation to a Drug Trafficking Crime)

On or about October 18, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly carry firearms during and in relation to a drug trafficking crime, to wit: Distribution of Cocaine, in violation of 21 U.S.C. § 841(a)(1) as alleged in Count III of this Indictment, which Count is incorporated by reference herein; all in violation of 18 U.S.C. § 924(c)(1)(A).

**COUNT V**

21 U.S.C. § 841(a)(1)  
(Distribution of Cocaine)

On or about October 24, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly and intentionally distribute cocaine, a schedule II controlled substance within the meaning of 21 U.S.C. § 812; all in violation of 21 U.S.C. § 841(a)(1), and punishable pursuant to 21 U.S.C. § 841(b)(1)(C).

**COUNT VI**

18 U.S.C. § 924(c)(1)(A)  
(Carrying Firearms During and in Relation to a Drug Trafficking Crime)

On or about October 24, 2019, in the Central Division of the District of Utah,

PATRICK JOHN VENTERS, aka "LION",

defendant herein, did knowingly carry firearms during and in relation to a drug trafficking crime, to wit: Distribution of Cocaine, in violation of 21 U.S.C. § 841(a)(1) as alleged in Count V of this Indictment, which Count is incorporated by reference herein; all in violation of 18 U.S.C. § 924(c)(1)(A).

**NOTICE OF INTENT TO SEEK FORFEITURE**

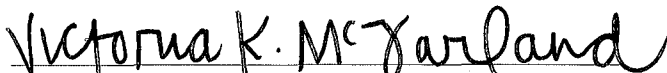
Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. § 924 or 21 U.S.C. § 841, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used in the commission of the offense(s), including, but not limited to:

- Smith & Wesson SD9 VE 9mm handgun, s/n FYD0129;
- Quality Arms QAI M 15 rifle, s/n QA10426;
- Beretta BU9 Nano 9mm handgun, s/n NU008706; and
- Llama .45 caliber handgun, s/n A93833.

A TRUE BILL:

  
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FOREPERSON OF GRAND JURY

JOHN W. HUBER  
United States Attorney

  
VICTORIA K. McFARLAND  
Special Assistant United States Attorney